

**AFFIDAVIT OF STEPHEN G. HANKS**

I, Stephen G. Hanks, do hereby depose and state as follows:

1. I am the President and Chief Executive Officer of Washington Group International ("Washington Group"). I have held this position since 2001. Washington Group is a global engineering and construction company with approximately 25,000 employees.

2. I am currently aware of the lawsuit filed by the Equal Employment Opportunity Commission (the "Litigation") arising out of the Sithe Mystic construction site in Everett, Massachusetts (the "Site").

3. I have been employed in Boise, Idaho at Washington Group's headquarters and never visited the Site throughout the time relevant to the allegations in the Litigation.


4. I have no personal knowledge of the alleged racially discriminatory conduct at the Site.

5. To the best of my recollection, my only relation to the allegations in the Litigation was my receipt in 2002 of weekly reports from Sr. Vice President of Human Resources, Larry Myers, summarizing pending EEOC charges against Washington Group. I cannot recall if Godwin Enagbare, Joe Willis, Leonard Bell, Johannes Kaindoh, Wayne Henderson, or John Baldwin ("Plaintiff-Intervenors") were identified in these reports.

6. I never directly communicated with corporate EEOC Officer Mike McDaniel or Site personnel regarding the charges of discrimination or Washington Group's response to them.

7. I made no decisions related to the complaints of harassment or discrimination that may have been made by employees working at the Site, or proposed responses to the same. I have no personal knowledge of the Plaintiff-Intervenors, their work performance, qualifications, complaints, or reasons for discipline or termination.

Signed under the pains and penalties of perjury this 22<sup>nd</sup> day of December 2006.

  
\_\_\_\_\_  
Stephen G. Hanks